

I have been an amateur for 15 years, 10 of which have been as an Extra licensee. Fourteen of those years I have been active on VHF and UHF, FM, SSB and CW. I wish to oppose the filing of the request to utilize British made FRS style radios (PMR 446) by British hams visiting the United States.

The probability of abuse of this by visitors is high, as the ability to police simplex frequencies, which are typically not as active as repeaters is obvious. To ask a rhetorical question, "what would it hurt to cheat a little if another family member of a visitor was not licensed and wished to use the PMR 446 radio?" Not many hams would be paying attention at that frequency. I scan it and 146.52 with a better than average outside vertical antenna almost all day long here on Cape Cod and hear nothing most days. I hear plenty on the FRS frequencies. Who will be there to police 446 MHz simplex, etc. among the amateur community?

Further, for anyone with the resources to make the trip stateside, resources will also be available to either come with a true amateur transceiver in tow (a handheld, presumably, although not necessarily). This will provide more than adequate interactions with local amateurs, and at a wider range of power levels and frequencies than PMR 446 radios afford.

In addition, if the visitors wish solely FRS style communications, anyone with the resources to travel internationally surely has the resources to go to a store stateside and purchase a three channel FRS radio. In fact, I just found the price of one such radio had been lowered to 10 dollars for one made by a well-known consumer electronics maker and bought this radio for my own use on the FRS.

Finally, the FCC, ARRL and the rest of the ham community has found that the importation of truly inexpensive radios has been abused. That is part of the source of the current problems on 10 and 12 meters (along with the very production of such radios overseas and their use there, admittedly). Here a good deal of unlicensed usage is found to be people operating cheap imported monoband radios stateside. The Commission need only check its records to find such nuisances.

Thus, it can be seen that there is no need to "foster international good will" by saving foreign visitors literally a few dollars by sparing them the purchase of a FRS radio, if that is what is desired, by substituting PMR 446 radios and a ham license.

Similarly, the majority of British hams interested in such operations will have a VHF or UHF radio that they will carry with them anyway. The present rules which allow operation of these radios are good enough exemplars of "fostering international good will".